

**REMARKS**

Claims 27-42 are pending. Claims 27 and 36 are in independent form.

In the Office action mailed July 10, 2007, claim 27 was rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,622,303 to Yamashita (hereinafter "Yamashita").

Claim 27 relates to a method that includes compiling a first map that associates identifiers of clients in a digital cable broadcast system with identifiers of groups of two or more clients in the digital cable broadcast system, transmitting the first map to available clients in the digital cable broadcast system, compiling a second map in which associations between subscriber identifiers and client group identifiers have been changed, transmitting the second map to available clients in the digital cable broadcast system, broadcasting digital cable content intended to be accessible only by a subset of available clients to all available clients in the digital cable broadcast system, and configuring clients in the digital cable broadcast system to compare the first group identifier broadcast in association with the digital cable content with any group identifiers from a most recently received one of the first map

and the second map that were associated with an identifier of the client, to determine if the digital cable content is to be discarded at the client.

Broadcasting the digital cable content includes associating the digital cable content with a first identifier of a first group of two or more clients and broadcasting the first identifier in association with the digital cable content. Accessible content is content that is to be output to client displays. Discarded content is content that is not to be output to client displays.

The rejection of claim 27 contends that Yamashita somehow involves maps that associate identifiers of clients in a digital cable broadcast system with identifiers of groups, as recited in claim 27. Applicant respectfully disagrees.

In this regard, Yamashita describes a system for broadcasting programs. *See, e.g., Yamashita*, col. 1, line 8-12. Yamashita's system includes a digital satellite broadcast system 1, a satellite 4, and a digital CATV broadcast system 2 that cooperate to deliver video and audio signals to the receiving terminals of subscribers 3. *See, e.g., id.*, FIG. 1.

In addition to the video and audio signals, the transport stream in Yamashita's system includes additional information. *See, e.g., id.*, col. 4, line 1-2. Among other items, the additional information includes a Condition Access Table (CAT) and a Program Map Table (PMT). *See, e.g., id.*, col. 4, line 2-5. The condition access table (CAT) includes EMM (Entitlement Management Message) information. *See, e.g., id.*, col. 4, line 6-7. EMM information represents encrypted contract data for each subscriber. *See, e.g., id.*, col. 4, line 10-11. PMT includes components of each channel and ECM (Encryption Control Message) necessary for descrambling data. *See, e.g., id.*, col. 4, line 7-10. ECM information is an encrypted descramble key. *See, e.g., id.*, col. 4, line 12-13.

FIG. 2 is a schematic diagram of the EMM information. *See, e.g., id.*, col. 3, line 28-29. The EMM information is composed of a (single) identification number and a (single) subscriber control signal. *See, e.g., id.*, col. 4, line 47-49. The identification number is a unique number assigned to each subscriber. *See, e.g., id.*, col. 4, line 49-52; line 53-56. The assigned unique identification number is stored on an IC card at the subscriber's terminal. *See, e.g., id.*, col. 4, line 56-57; col. 5, line 15-16, 31-32; col. 8, line 8-9. The

assigned unique identification number is used to determine whether subsequently received EMM information is addressed to the subscriber's terminal. *See, e.g., id., col. 5, line 16-22.*

Such subsequently received EMM information can be used to change the programs to which a subscriber has access. *See, e.g., id., col. 5, line 42-54.* In particular, as discussed above, EMM information includes subscriber control signal. The subscriber control signal includes contract data. *See, e.g., id., col. 5, line 23-25.* Contract data corresponds to the particular subscriber's contract information. *See, e.g., id., col. 5, line 37-39.* At the subscribers' terminals, descramble keys are generated only when the contract data allows the scrambled program to be descrambled. *See, e.g., id., col. 5, line 26-40; col. 8, line 28-48.*

The rejection of claim 27 is based on the contention that one or both of the unique identification number or the particular subscriber's contract information constitutes a map that associates identifiers of clients in a digital cable broadcast system with identifiers of groups of two or more clients. *See Office action mailed July 10, 2007, page 2.* Applicant respectfully disagrees. As discussed above, Yamashita's EMM information includes only a single identification number and a single subscriber control signal.

*See, e.g., id., FIG. 2; col. 4, line 47-49.* This is perhaps not surprising given that each identification number is uniquely assigned to a single subscriber and the subscriber control signal includes contract data that corresponds to that particular subscriber's contract information.

Yamashita's EMM information is not a map that associates identifiers of clients with identifiers of groups of clients. Instead, Yamashita's EMM information is uniquely addressed to individual subscribers using a single unique identifier of that subscriber and includes contract information relevant only to the addressed individual subscriber.

This is not a trivial distinction from the subject matter recited in claim 27. As discussed in para. [0002] of the specification, at certain traffic levels, individually addressing client-specific messages can be cumbersome and time-consuming for a host and can reduce the available bandwidth. In contrast, Applicants have recognized that group membership maps can be updated at a head end and subsequently transmitted to client devices. *See also specification, para. [0020].*

Since Yamashita does not involve maps that associate identifiers of clients in a digital cable broadcast system with identifiers of groups, Yamashita neither describes nor suggests transmitting such maps to clients in a digital cable broadcast

system, as recited. Accordingly, claim 27 is not anticipated by Yamashita. Applicant respectfully requests that the rejections of claim 27 and the claims dependent therefrom be withdrawn.

Claim 36 was rejected under 35 U.S.C. § 102(e) as anticipated by Yamashita.

Claim 36 relates to a broadcast system that includes a data transmission network, a head end, and a collection of clients.

The head end includes a map that associates identifiers of clients in the broadcast system with identifiers of groups of two or more clients in the broadcast system, logic to associate content that is to be broadcast with an appropriate group identifier, and a transmitter to transmit the map and broadcast the content in association with the appropriate group identifier over the data transmission network even when the content is intended to be accessible only by a subset of available clients in the broadcast system.

Each client in the collection of clients includes a receiver to receive the broadcast content in association with the appropriate group identifier and the map from the head end over the data transmission network, logic to identify one or more groups to which the client belongs from the received map, and logic to compare group identifiers associated with received broadcast content to group identifiers of any identified groups

to determine if the broadcast content is accessible content that is to be output to a client display or inaccessible content that is not to be output to the client display. Accessible content is content that is to be output to a client display

The rejection of claim 36 is based on the contention that one or both of the unique identification number or the particular subscriber's contract information constitutes a map that associates identifiers of clients in a digital cable broadcast system with identifiers of groups of two or more clients. *See Office action mailed July 10, 2007, page 4, first paragraph.* Applicant respectfully disagrees. As discussed above, Yamashita's EMM information includes only a single identification number and a single subscriber control signal. Yamashita's EMM information thus is not a map that associates identifiers of clients with identifiers of groups of clients. Instead, Yamashita's EMM information is uniquely addressed to individual subscribers using a single identifier and includes information relevant only to the addressed individual subscriber.

Since Yamashita does not involve maps that associate identifiers of clients in a digital cable broadcast system with identifiers of groups, Yamashita neither describes nor suggests a head end that includes a transmitter to transmit such a map,

as recited in claim 36. Yamashita also neither describes nor suggests logic to identify one or more groups to which the client belongs from such a map, as recited in claim 36. Accordingly, claim 36 is not anticipated by Yamashita. Applicant respectfully requests that the rejections of claim 36 and the claims dependent therefrom be withdrawn.

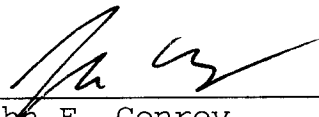
It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.



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Respectfully submitted,

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